

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

ALBERT BROWN,

*Plaintiff,*

vs.

ACCOUNT RESOLUTION  
SERVICES LLC,

*Defendant.*

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Case No. 5:21-cv-00864-SLP

**DEFENDANT'S DISCLOSURE STATEMENT IDENTIFYING  
CONSTITUENTS OF LLC OR PARTNERSHIP**

Defendant, Healthcare Revenue Recovery Group, LLC d/b/a ARS Account Resolution Services,<sup>1</sup> by and through its undersigned counsel, files this Disclosure Statement Identifying Constituents of LLC or Partnership pursuant to LCvR7.1.1, and would respectfully show as follows:

1. Plaintiff has not invoked federal jurisdiction in this case on the basis of diversity of citizenship with an LLC or partnership. Instead, Plaintiff has invoked federal jurisdiction in this case on the basis of federal question pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1692k(d). [ECF No. 1, p. 1, ¶ 2].

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<sup>1</sup> Defendant has been incorrectly named in this suit as Account Resolution Services LLC.

2. The full name of this Defendant is Healthcare Revenue Recovery Group, LLC (“HRRG”), who does business in Oklahoma as ARS Account Resolution Services.

3. HCFS Health Care Financial Services, LLC (“HCFS”) is the sole member of HRRG.

4. Neither HRRG nor HCFS is a publicly held corporation.

5. Neither HRRG nor HCFS is a governmental entity.

Dated: September 24, 2021.

Respectfully submitted,

/s/ Kevin T. Crocker

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ATTORNEYS FOR DEFENDANT  
HEALTHCARE REVENUE RECOVERY  
GROUP, LLC d/b/a ARS ACCOUNT  
RESOLUTION SERVICES

**CERTIFICATE OF SERVICE**

This is to certify that on the 24<sup>th</sup> day of September 2021, a true and correct copy of the above and foregoing “*Defendant’s Disclosure Statement Identifying Constituents of LLC or Partnership*” was served *via the Court’s CM/ECF system and/or by e-mail transmission* on counsel for Plaintiff, Tiffany Hill, Esq., 1415 NW 43<sup>rd</sup> Street, Oklahoma City, Oklahoma 73118, (405) 216-3126 [Telephone], e-mail: [thlegalconsulting@gmail.com](mailto:thlegalconsulting@gmail.com).

/s/ Kevin T. Crocker

Kevin T. Crocker, Esq.